

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

H.M. & I.B.,

Plaintiffs,

v.

RADHESHVAR, LLC, d/b/a  
MOTEL 6,

Defendant.

CIVIL ACTION FILE

NO. 1:24-cv-4039-TWT

**CONSENT MOTION TO EXTEND THE DISCOVERY PERIOD**

The parties request that this Court extend discovery until January 8, 2026.

This lawsuit arises from allegations that Plaintiffs were trafficked for sex when they were 18 years old at the Motel 6 located at 2820 Chamblee Tucker Road, Atlanta, Georgia 30341.

The discovery period is set to expire on October 8, 2025. The parties have worked together in good faith to streamline and conduct discovery in two cases (this case and *H.M. and I.B. v. Radheshvar, LLC d/b/a Super 8*, 1:24-cv-4041) efficiently. In doing so, the parties have exchanged written discovery, documents, and have been working to schedule depositions of the party witnesses. Plaintiffs' counsel and Defendant's counsel have been on opposite sides of several sex-trafficking cases over the last couple of years. In each instance, they have been able to work well together, and in those other cases, at least, were able to reach a settlement without a trial.

Recently, Plaintiffs' main counsel had to undergo an urgent surgical procedure (placement of three cardiac stents). As a result, counsel has been out of work and is only now returning to work slowly. Counsel's poor health and now recovery has affected the parties' ability to complete critical discovery, including the deposition of Defendant and the depositions of third-party witnesses.

Given Plaintiffs' counsel's recent, unexpected health issues, the parties conferred and agreed that a discovery extension is necessary and appropriate to complete the depositions of Defendant and third-party witnesses.

Accordingly, the parties respectfully request that the Court extend discovery for three months; that is, until January 8, 2026.

Respectfully submitted on October 1, 2025.

ANDERSEN, TATE & CARR, P.C.

/s/ Rory A. Weeks

PATRICK J. MCDONOUGH

Georgia Bar No. 489855

[pmcdonough@atclawfirm.com](mailto:pmcdonough@atclawfirm.com)

JONATHAN S. TONGE

Georgia Bar No. 303999

[jtonge@atclawfirm.com](mailto:jtonge@atclawfirm.com)

RORY A. WEEKS

Georgia Bar No. 113491

[rweeks@atclawfirm.com](mailto:rweeks@atclawfirm.com)

JENNIFER M. WEBSTER

Georgia Bar No. 760381

[jwebster@atclawfirm.com](mailto:jwebster@atclawfirm.com)

One Sugarloaf Centre  
1960 Satellite Boulevard, Suite 4000  
Duluth, Georgia 30097  
(770) 822-0900 | Telephone  
(770) 822-9680 | Facsimile

SWIFT, CURRIE, McGHEE & HIERS

/s/ Kori E. Wagner

KORI E. WAGNER

Georgia Bar No. 155438

Kori.wagner@swiftcurrie.com

MARISSA H. MERRILL

Georgia Bar No. 216039

Marissa.merrill@swiftcurrie.com

TRACY A. GILMORE

Georgia Bar No. 633193

Tracy.gilmore@swiftcurrie.com

1420 Peachtree Street, N.E., Suite 800  
Atlanta, Georgia 30309-4347  
(404) 874-8800

## CERTIFICATE OF COMPLIANCE

Under Local Rules 5.1(C) and 7.1(D), I hereby certify that the foregoing filing complies with the applicable font type and size requirements and is formatted in Times New Roman, 14-point font.

ANDERSEN, TATE & CARR, P.C.

*/s/ Rory A. Weeks*

---

PATRICK J. MCDONOUGH

Georgia Bar No. 489855

[pmcdonough@atclawfirm.com](mailto:pmcdonough@atclawfirm.com)

JONATHAN S. TONGE

Georgia Bar No. 303999

[jtonge@atclawfirm.com](mailto:jtonge@atclawfirm.com)

RORY A. WEEKS

Georgia Bar No. 113491

[rweeks@atclawfirm.com](mailto:rweeks@atclawfirm.com)

JENNIFER M. WEBSTER

Georgia Bar No. 760381

[jwebster@atclawfirm.com](mailto:jwebster@atclawfirm.com)

One Sugarloaf Centre  
1960 Satellite Boulevard, Suite 4000  
Duluth, Georgia 30097  
(770) 822-0900 | Telephone  
(770) 822-9680 | Facsimile